

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as representative of

THE COMMONWEALTH OF
PUERTO RICO, *et al.*

Debtors,¹

PROMESA

Title III

No. 17-BK-03283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as a representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

No. 17-BK-03567 (LTS)

**MOTION TO INFORM APPEARANCE OF THE AD HOC GROUP OF FGIC
INSURED NOTEHOLDERS AT HEARING ON CONFIRMATION OF HTA PLAN
OF ADJUSTMENT AND AUGUST 17-18, 2022, OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

Taconic Capital Advisors LP, Aurelius Capital Management, LP, Canyon Capital

¹ The Debtors in the various Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Advisors LLC, and First Ballantyne LLC (collectively, the “Ad Hoc Group of FGIC Insured Noteholders”)² by and through its undersigned counsel, hereby respectfully submits this motion to inform (the “Informative Motion”) pursuant to the *Order Regarding Procedures For Hearing on Confirmation of HTA Plan of Adjustment and August 17-18, 2022, Omnibus Hearing* [Commonwealth Dkt. No. 21494; HTA Dkt. No. 1270] (the “Procedures Order”),³ and respectfully states as follows:

1. Lawrence A. Larose of Sheppard Mullin Richter & Hampton LLP will appear on behalf of the Ad Hoc Group of FGIC Insured Noteholders at the Hearing on Confirmation of the HTA Plan of Adjustment and the August 17-18, 2022 Omnibus Hearing (together, the “Hearings”). Mr. Larose intends to appear live via the CourtSolutions speaking line. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.⁴

2. Mr. Larose, on behalf of the Ad Hoc Group of FGIC Insured Noteholders, reserves the right to be heard and present oral argument at the Hearings related to any matter (i) identified in the agendas to be filed by the Oversight Board in connection with the Hearings, (ii) pertaining to the *Third Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* [Commonwealth Dkt. No. 21271; HTA Dkt. No. 1242], as may be amended, modified, or supplemented (the “HTA Plan”), or (iii) raised by any party at the

² Each member of the Ad Hoc Group of FGIC Insured Noteholders files this Informative Motion exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

³ Capitalized terms not defined herein shall have the meanings ascribed to them in the Procedures Order unless otherwise noted.

⁴ In accordance with the Procedures Order, the Informative Motion contains cover sheets for Exhibit B and Exhibit C. However, since the Ad Hoc Group of FGIC Insured Noteholders has not filed any exhibits, and does not intend to examine any witnesses at the Hearings, the Ad Hoc Group of FGIC Insured Noteholders wrote “N/A” on the Exhibit B and Exhibit C cover sheets as directed by the Procedures Order. *See* Procedures Order ¶ 6.

Hearings related to the HTA Plan, the Title III cases, or otherwise which may affect the interests of the Ad Hoc Group of FGIC Insured Noteholders. The Ad Hoc Group of FGIC Insured Noteholders further reserves the right to amend this Informative Motion as needed.

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Dated: July 27, 2022

Respectfully submitted,

CÓRDOVA & DICK, LLC

/s/Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of
FGIC Insured Noteholders*

- and -

**SHEPPARD MULLIN RICHTER & HAMPTON
LLP**

/s/Lawrence A. Larose

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*Counsel to the Ad Hoc Group of FGIC Insured
Noteholders*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

CÓRDOVA & DICK, LLC

/s/Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of FGIC Insured
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Exhibit A

PARTY APPEARANCE SHEET

Name of Party	Ad Hoc Group of FGIC Insured Noteholders	The party is attending <u>both</u> the Confirmation Hearing and the Omnibus Hearing.
ATTORNEY 1	Appearance Method	CourtSolutions Speaking Line
	Name	Lawrence A. Larose
	Law Firm	Sheppard Mullin Richter & Hampton LLP
	Email	LLarose@sheppardmullin.com
	Phone Number	(212) 896-0627
	Docket Entry No. of Notice of Appearance	Dkt. No. 16976
Pursuant to the Hearing Procedures Order ¶1, in-person participation by counsel will be prioritized in the following manner: the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be permitted 4 attorneys present in Courtroom 3 in San Juan, and each other party-in-interest shall be permitted 2 attorneys present in Courtroom 3 in San Juan.		
Space permitting, additional attorneys who wish to view but not participate in the Confirmation Hearing or August Omnibus Hearing may gain admittance to the live courtroom (Courtroom 3 in San Juan), or the live feed which will be broadcasted in Courtroom 17C in New York on a first-come first-served basis. All attorneys who wish to observe in person must be listed on this appearance sheet.		

Exhibit B

N/A

Exhibit C

N/A